Fill in this information to identify the case:

Debtor 1 David J. Wallace

Debtor 2
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of PA

Case number 20-10306 AMC

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: PennyMac Loan Services, LLC

Court claim no. (if known): 24

Last 4 digits of any number you use to identify the debtor's account: 0795

Property address:
8271 Williams Avenue
Philadelphia, PA 19150

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: $ ________

Part 3: Postpetition Mortgage Payment

Check one:

☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 02 / 01 / 2025

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) $ ________

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) $ ________

c. **Total.** Add lines a and b. (c) $ ________

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

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Debtor(s) David J. Wallace
First Name Middle Name Last Name

Case Number *(if known)*: 20-10306 AMC

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

×/s/ Denise Carlon

Denise Carlon
27 Feb 2025, 12:13:17, EST

Date 02/27/2025

KML Law Group, P.C.
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bkgroup@kmllawgroup.com
Attorney for Creditor

Document ID: c919eb88d0ff80b6f93ffe4a37f76692b61928098a7d733e3b79dcdb7b405071

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:David J. Wallace dba Wallace Freight, Inc **Debtor(s)** **PennyMac Loan Services, LLC** **Movant** **vs.** **David J. Wallace dba Wallace Freight, Inc** **Debtor(s)** **Kenneth E. West** **Trustee**	**BK NO. 20-10306 AMC** **Chapter 13** **Related to Claim No. 24**

CERTIFICATE OF SERVICE

I, Denise Carlon, certify that on 2/28/2025, I did cause a true and correct copy of the documents described below to be served on the parties listed on the mailing list exhibit, a copy of which is attached and incorporated as if fully set forth herein, by the means indicated and to all parties registered with the Clerk to receive electronic notice via the CM/ECF system:

- Response to Notice of Final Cure Mortgage Payment

I certify under penalty of perjury that the above document(s) was sent using the mode of service indicated.

Dated: 2/28/2025

/s/ Denise Carlon
Denise Carlon, Esquire
Attorney I.D. 317226
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
201-549-2363
bkgroup@kmllawgroup.com

Name and Address of Party Served	Relationship of Party	Via
David J. Wallace dba Wallace Freight, Inc 8271 Williams Avenue Philadelphia, PA 19150	Debtor	☐ Hand-delivered ☒ First Class Mail ☐ Certified mail ☐ E-mail ☐ CM/ECF ☐ Other ___________________________ (as authorized by the court *)
Michael A. Cibik Esq. Cibik Law, P.C. 1500 Walnut Street, Suite 900 Philadelphia, PA 19102	Attorney for Debtor	☐ Hand-delivered ☐ First Class Mail ☐ Certified mail ☐ E-mail ☒ CM/ECF ☐ Other ___________________________ (as authorized by the court *)
Kenneth E. West Office of the Chapter 13 Standing Trustee 190 N. Independence Mall West, Suite 701 Philadelphia, PA 19106	Trustee	☐ Hand-delivered ☐ First Class Mail ☐ Certified mail ☐ E-mail ☒ CM/ECF ☐ Other ___________________________ (as authorized by the court *)